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COUNSEL FOR RUSSELL BRANDS, LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
SEARS HOLDINGS CORPORATION, <i>et al.</i>,	:	Case No. 18-23538 (RDD)
	:	
Debtors.	:	(Jointly Administered)
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NOTICE OF APPEARANCE AND REQUEST FOR ALL NOTICES

The law firm of Wyatt, Tarrant & Combs, LLP, pursuant to Federal Rule of Bankruptcy Procedure 9010, hereby enters its appearance as attorneys for Russell Brands, LLC, with regard to all matters and proceedings in the above-captioned case, showing counsel's name, office mail address, electronic mail address and telephone number as follows:

Mary L. Fullington
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Russell Brands, pursuant to Federal Rule of Bankruptcy Procedure 2002, hereby requests that all notices required to be given under Rules 2002, 4001, 6004, 6006, 6007 and 9019 be given to Russell Brands by due service upon its undersigned attorneys, Wyatt, Tarrant & Combs, LLP, at the address stated above.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Bankruptcy Rules specified above, but also includes all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, statements of affairs, operating reports, schedules of assets and liabilities, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, hand delivery, telephone, fax, email or otherwise, that affect, or may potentially affect, the debtor or the property of the debtor.

PLEASE TAKE FURTHER NOTICE that Creditor intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive (1) Creditor's right to have final orders in non-core or *Stern* matters entered only after *de novo* review by a District Judge; (2) Creditor's right to trial by jury in any proceeding so triable in this case or any case, controversy or proceeding related to this case; (3) Creditor's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs or recoupments to which Creditor is or may be entitled under agreement, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments Creditor expressly reserves.

Dated: November 2, 2018
Lexington, Kentucky

Respectfully submitted,

/s/ Mary L. Fullington
Mary L. Fullington (KY 85335)
WYATT, TARRANT & COMBS, LLP
250 West Main Street, Suite 1600
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COUNSEL FOR RUSSELL BRANDS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2018, a true and correct copy of the foregoing Notice of Appearance and Request for All Notices was filed and served electronically via the Court's CM/ECF system upon those who are registered to receive electronic notice.

/s/ Mary L. Fullington

Mary L. Fullington

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